

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Helene Marie Yohn

Debtor(s)

SRP 2013-10, LLC

Movant

vs.

Helene Marie Yohn

Respondent(s)

BK NO. 22-01760 HWV

Chapter 13

Hearing Date: 12/14/2022

**OBJECTION OF SRP 2013-10, LLC
TO CONFIRMATION OF CHAPTER 13 PLAN**

SRP 2013-10, LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. The claims bar date is November 25, 2022. Secured Creditor intends to file a claim on or before the bar date with the total debt estimated at \$13,951.66.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. The Secured Creditor holds a mortgage on the Debtor's property located at 451 Linton Hill Road, Duncannon PA 17020, and the "cramdown" impermissibly attempts to modify the Secured Creditor's claim in violation of 11 U.S.C. 1322 (b) (2).
4. Debtor's Plan understates the amount of the Secured Creditor's claim by \$13,951.66, and does not provide sufficient funding to pay said claim including present value interest.
5. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
6. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, SRP 2013-10, LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: November 2, 2022

By: /s/ Brian C. Nicholas, Esquire

Brian C. Nicholas, Esquire

BNicholas@kmlawgroup.com

Attorney I.D. No. 317240

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106

Phone: 412-430-3594

Attorney for Movant/Applicant